April 3, 2020

Don Rucker, M.D.
National Coordinator for Health Information Technology
Office of the National Coordinator for Health Information Technology
U.S. Department of Health and Human Services
330 C Street SW, Floor 7
Washington, DC 20201
Via Email: exchangeframework@hhs.gov

Re: Comments on the Office of the National Coordinator for Health Information Technology on the 2020-2025 Federal Health IT Strategic Plan

Dear Dr. Rucker,

Michigan Health Information Network Shared Services (MiHIN) appreciates the opportunity to submit comments on the Office of the National Coordinator (ONC) for Health Information Technology on the 2020-2025 Federal Health IT Strategic Plan.

MiHIN is Michigan's state-designated entity that facilitates the exchange of electronic health information and builds technical and collaborative partnerships between healthcare providers throughout the state. From hospitals and providers, to pharmacies and payers, MiHIN creates the technology and state-of-the-art resources needed to ensure the electronic health records of Michigan citizens are available to all that deliver care services.

MiHIN has been at the forefront of statewide interoperability efforts for almost a decade and is devoted to advancing nationwide interoperability. We believe that positive change happens when policy and strategic planning work hand-in-hand, and we applaud the ONC's work to align the 2020-2025 Federal Health IT Strategic Plan with both the 21st Century Cures Act Final Rules and with the Trusted Exchange Framework and Common Agreement (TEFCA).

MiHIN fully supports the goals outlined in the 2020-2025 Federal Health IT Strategic Plan and places emphasis on the final goal of *"Connecting Health Care and Health Data through an Interoperable IT Infrastructure."* When health information is available at the point-of-care, patients receive safe, efficient, high quality services and have better health outcomes. As evidenced by the current coronavirus disease 2019 (COVID-19) pandemic, this becomes especially critical when the healthcare system is under unprecedented strain. Investing in HIT infrastructure, and in particular telemedicine, it is essential to ensuring that our country is better equipped to deliver care both in crisis and in normal life.

In large part, MiHIN and Michigan stakeholders are overwhelmingly pleased with the draft of the 2020-2025 Federal Health IT Strategic Plan. We have several salient observations and suggested ways to improve the draft further, as described herein. MiHIN encourages ONC to review the following comments and recommendations to maximize the positive impact of the 2020-2025 Federal Health IT Strategic Plan on healthcare stakeholders.

- **Goal 1: Promote Health and Wellness**

  - **Objective 1a: Improve individual access to health information.**
    - The draft identifies the importance of patient access (and contribution) to health data but does not specifically address patient-managed consent especially as It relates to specially protected health information. This is critical to integrate physical and behavioral health, even more so once data moves more freely nationally under TEFCA.

  - **Objective 1b: Advance healthy and safe practices through health IT.**
    - The draft recognizes the potential to leverage health data to identify and prevent epidemics and otherwise improve population health outcomes. The ongoing COVID-19 pandemic demonstrates this crucial need. ONC's Strategic Plan should ensure that federal health IT systems used for emergency response or population health align with ONC's goals on interoperability. For example, many Centers for Disease Control (CDC) funding opportunities focus on specific health issues, which can lead to siloed IT and data strategies. Funding opportunities should encourage the utilization of existing and proven health information exchanges and networks.

  - **Object 1c: Integrate health and human services information.**
    - MiHIN applauds the focus on Social Determinants of Health (SDOH) and fully agrees that a lack of agency coordination creates inefficiencies and inhibits our ability to address SDOH. State governments have multiple health and human service systems that are used to manage specific programs. While they often collect the same information from the same people, there is not an efficient or secure way to share this information. ONC should encourage interoperability when reviewing requests for human service IT systems. ONC should also promote the use of the existing Health Information Exchange (HIE) by community-based organizations (CBOs)to effectively share data. This could be helpful in the areas of Food Assistance, Juvenile Justice, Behavioral Health, and Child Welfare.
    - CBOs must have the requisite HIT infrastructure and adoption support to "become fully integrated as part of the care continuum." We agree that

SDOH should be captured in the healthcare setting and recorded in electronic health records; however, to be able to do so, we need an industry-vetted standardized way to capture and record SDOH. Further, in addition to improving technical infrastructure of community-based organizations so that they can access patient SDOH, ONC may need to issue further guidance around how CBOs can access SDOH if it becomes PHI in a medical record.

- **Goal 2: Enhance the Delivery and Experience of Care**

  - **Objective 2a: Ensure safe and high-quality care through the use of health IT**
    - The COVID-19 pandemic has spurred great interest in Telehealth in the provider community. The ability to provide health care remotely can mitigate the spread of COVID-19 disease while protecting our health care professionals.   Once we are past the COVID-19 emergency, ONC should evaluate the impact Telehealth solutions have on patient and provider access to health data and consider requiring Telehealth companies to meet interoperability requirements so that data is at the right place at the right time to assure optimal treatment.
    - MiHIN agrees that improving patient matching is critical to the success of Federal Health IT, particularly as TEFCA moves closer to implementation and patient matching becomes a nationwide challenge. ONC should identify and support effective patient matching methodologies, such as those implemented by MiHIN and other HIE's nationally. MiHIN is willing to assist ONC as they move forward with this objective.

  - **Objective 2c: Reduce regulatory and administrative burden on providers**
    - The Draft Strategic Plan identifies administrative and regulatory burden as an obstacle to better clinical care and recommends the harmonization of data collection and reporting requirements across federal agencies. ONC could further reduce the provider burden by taking the same action with payers who participate in federal health care programs, such as Medicare and Medicaid. For example, opportunities for burden reduction around quality measurement and prior authorization must continue to advance.

  - **Objective 2d: Enable efficient management of resources and a workforce confidently using health IT**
    - MiHIN fully supports the emphasis on HIT workforce development and believes that this is critical to future success of HIT. We've founded the nonprofit Interoperability Institute whose goal, in part, is to recruit and

train college students and young professionals in HIT in hopes that they fill this critical gap both in Michigan and nationally.

- ■ **Goal 3: Build a Secure, Data-Driven Ecosystem to Accelerate Research and Innovation**

    - o **Objective 3a: Advance individual- and population-level transfer of health data**
        - ▪ As recognized in the Draft Strategic Plan, effective data governance will be necessary. ONC should research the legal frameworks currently in place to determine their viability to accomplish this objective. For example, MiHIN has established a shared legal framework for data sharing that could be used to support innovative uses of shared data.

- ■ **Goal 4: Connect Healthcare and Health Data through an Interoperable Health IT Infrastructure**

    - o **Objective 4a: Advance the development and use of health IT capabilities**
        - ▪ MiHIN fully supports all subpoints of Objective 4a. As healthcare moves increasing toward a digital economy—perhaps on a faster track due to the COVID-19 pandemic—it is critical that the ONC fully support HIT developers and new healthcare business models to ensure that care matches consumer need and expectations.
    - o **Objective 4c: Enhance technology and communications infrastructure**
        - ▪ The IT infrastructure must be capable to support the objectives of this Strategic Plan. Telehealth could stretch the limits of broadband capabilities where it is most needed, in our rural and underserved areas. Patient access to individual health records could also be compromised for those who are struggling with poverty. ONC could work with Federal Communications Commission (FCC) and the United States Department of Agriculture to prioritize improved access to address these issues.

Thank you for the opportunity to provide feedback on the 2020-2025 Federal Health IT Strategic Plan. If we can provide any additional information or clarification, please do not hesitate to contact me at Nick.Lyon@mihin.org

Sincerely,

Nick Lyon, Senior Policy Advisor
Michigan Health Information Network Shared Services (MiHIN)